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Author: rae_willis@berlex.com at Internet
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TO: 9-NPRM-CMTS at ARM
Subject: PROPOSED CHANGES IN STC RULES

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Gentlemen:

With regard to the NPRM, we are in favor of stringent airworthiness testing in the case of major airframe and/or engine-system modifications for transport aircraft.

Requiring recertification for GA aircraft undergoing minor airframe modifications or engine substitutions/modifications would be counterproductive in our opinion. One of the major problems we have with FAA regulation is the difficulty encountered in efforts to upgrade/improve existing aircraft. General Aviation aircraft can often be improved by updating systems and engines and sometimes even by airframe modifications. Safety is enhanced by the addition of shoulder belts and modern avionics. Performance and safety may be enhanced by engine upgrades (ie: dual magneto drives replacing a single drive, fuel injection replacing carburetion). Removal of OEM installed problem items can also improve safety (ie: removal of ram air devices prone to icing).

Modifications and refinements of older designs can do much to increase their value, safety and utility. Such modifications should be regulated to be sure. Modifiers seeking STC's should be required to test their products appropriately and their data should be checked, but recertification would only serve to discourage innovation and improvement.

We who fly a modified Mooney M20J can attest to the increased safety of an added climb capability associated with the installation of a more powerful engine and airframe upgrades consistent with those added to the same airframe by the OEM. Had these upgrades required recertification, they would not have become available to us and we would still be flying the original production model rather than one that has been updated by ten years. We have improved the performance, reliability and safety of our 1980 aircraft by continual modernization of its airframe engine and navigation systems. We wish to continue to have this option available to us. Please do not promulgate regulations to deny us this capability. C. R. Willis, Jr.
Candace J. Oldham
Mooney N3515H